



December 8, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte in CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch:

On December 5, 2016, Peter Hayes, CEO of VTCSecure, LLC, met with Karen Peltz-Strauss of the Consumer and Governmental Affairs Bureau to discuss the process for a company to be certified to provide Video Relay Service (VRS) and Internet Protocol Captioned Telecommunications Service (IP CTS). VTCSecure believes that its innovative technology platform can be combined with outstanding interpreter services to provide the Deaf and Hard of Hearing community greater functional equivalence and innovative new services at lower cost to the Telecommunications Relay Service Fund (TRS).

Mr. Hayes stressed that VTCSecure's technology would allow a new VRS and IP CTS provider to offer its services under the TRS Fund reimbursement glide path adopted by the Commission in the 2013 *VRS Reform Order*. In addition, Mr. Hayes said that VTCSecure planned to use its Personal Communications Service endpoint that is built on the Commission's open source Accessible Communications Service (ACE) application. Because the endpoint and VTCSecure's network platform are both built using open source software, Mr. Hayes also pointed out that the VTCSecure platform could be used to facilitate the interoperability and common network platform goals that the Commission also adopted in the *VRS Reform Order*.

Respectfully submitted,

A handwritten signature in purple ink, appearing to read "Earl W. Comstock", is written over a horizontal line.

Earl W. Comstock
General Counsel
VTCSecure, LLC
1499 Gulf to Bay Blvd.
Clearwater, FL 33755
(202) 255-0273